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7 Attorneys for Plaintiff Jeremy Harkins

8 UNITED STATES DISTRICT COURT, EASTERN DISTRICT OF CALIFORNIA

9

10 JEREMY HARKINS) Case No.: 2:20-CV-00347-KJM-EFB
11 Plaintiff,)
12 v.)
13 SUTTER COUNTY; SUTTER COUNTY'S)
14 SHERRIFF DEPARTMENT;)
15 CALIFORNIA FORENSICS MEDICAL)
16 GROUP; TAYLOR FITHIAN, M.D.;)
17 DORIS BROWN, FNP; SHERILL)
18 McGuire, RN; LISA ROGERS, RN;)
19 SHERIFF BRANDON BARNES;)
20 CAPTAIN DAN BUTTLER; SERGEANT)
21 HERNANDEZ; SERGEANT GARCIA;)
22 SERGEANT EATON; OFFICER E.)
23 BROOKS; OFFICER OLSON; OFFICER)
24 SANTOS; OFFICER WEATHERUP;)
25 WELLPATH MANAGEMENT, INC.;)
26 THOMAS PANGBURN, M.D. AND)
27 DOES 1-50,)
28 Defendants.)

STIPULATION RE DISCOVERY CUT-OFF DATES & FUTURE PROCEEDINGS

IT IS HEREBY STIPULATED by and between the Parties, through their respective
counsel of record, that the following current discovery cut-off dates and future proceedings of

- 25 (1) **Fact Discovery:** May 29, 2021;
- 26 (2) **Expert Disclosures:** June 29, 2021;
- 27 (3) **Expert Discovery:** August 29, 2021;
- 28 (4) **Law and Motion:** September 29, 2021;

(5) Scheduling of pretrial and trial: The parties propose that any modifications to standard pretrial or trial proceedings be requested by October 30, 2021.

be continued two months, with the new dates being:

- (1) Fact Discovery:** September 29, 2021;
- (2) Expert Disclosures:** October 29, 2021;
- (3) Expert Discovery:** January 29, 2022;
- (4) Law and Motion:** February 28, 2022;

(5) Scheduling of pretrial and trial: The parties propose that any modifications to standard pretrial or trial proceedings be requested by March 28, 2022.

Good cause exists for this extension as discovery in this case involves numerous depositions, and discovery has been delayed due to the ongoing pandemic. Plaintiffs have named four additional defendants in its amended complaint. Plaintiffs are also waiting for a newly added defendant to answer the complaint.

All parties have also agreed to private mediation with Hon Maria-Elena James, and mediation will be completed in the last week of June 2021.

This is the second request for a discovery cut-off extension.

IT IS SO STIPULATED.

DATED: May 3, 2021

ABBEY, WEITZENBERG, WARREN & EMERY

By: /s/Brian G. Lance
Michael D. Green
Brian G. Lance
Attorneys for Plaintiff

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2 DATED: May 3, 2021

LAW OFFICES OF JEROME M. VARANINI

3 By: /s/Jerome M. Varanini

4 Jerome M. Varanini
5 Attorneys for Defendants, California
6 Forensic Medical Group, Inc.; Wellpath
7 Management, Inc.; Doris Brown, Lisa
8 Rogers, and Sherril McGuire

9 DATED: May 3, 2021

BURKE, WILLIAMS & SORENSEN, LLP

10 By: /s/Gregory B. Thomas

11 Gregory B. Thomas
12 Michael A. Slater
13 Attorneys for Defendants Sutter County,
14 Sheriff Brandon Barnes, Captain Dan
15 Buttler, Sergeant Gloria Hernandez, Sergeant
16 Jose Garcia-Cortes, Former Sergeant Lester
17 Eaton, Officer Ethan Brooks, Sergeant
18 Kaitlyn Olson, Officer Laurie Helzer, and
19 Officer Michael Weatherup

20 The Court grants the parties' second request for an extension as follows:

21 (1) **Fact Discovery:** September 29, 2021;
22 (2) **Expert Disclosures:** October 29, 2021;
23 (3) **Expert Discovery:** January 29, 2022;
24 (4) **Law and Motion:** March 4, 2022;
25 (5) **Scheduling of pretrial and trial:** The parties propose that any
26 modifications to standard pretrial or trial proceedings be requested by March 28,
27 2022.

28 IT IS SO ORDERED.

DATED: May 3, 2021.


29 CHIEF UNITED STATES DISTRICT JUDGE